

EXHIBIT 10

LAW OFFICE OF KATHLEEN J. HILL
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FAX COVER SHEET

DATE: August 12, 2004
TO: Leah M. Moore
FAX: (617) 367-3125
FROM: Kathleen J. Hill
TELEPHONE: (617) 742-0457

TOTAL PAGES NOT INCLUDING FAX COVER SHEET: 1 page

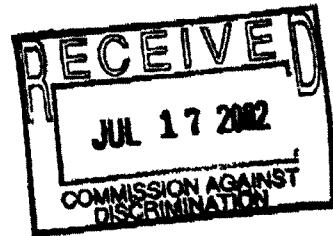
MESSAGE:

William Queenan?
Exhibit 22 of the Complaint - PCF at MCAD
See attached July 15, 2002 letter from Queenan to Sarah L. Fisher at the MCAD.

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July 15, 2002



Sarah L. Fisher
Field Representative
The Commonwealth of Massachusetts
Commission Against Discrimination
One Ashburton Place
Boston, MA 02108

RE: Griffith V. Commercial Union Insurance Co./Edmund Freeman NO: 97131760

Dear Ms. Fisher,

Thank you for providing us additional time to respond to your request.

Enclosed is a copy of Ms. Griffith's personnel file. The first section includes medical information that is normally kept in a separate file.

This file also contains references to accommodation requests. It also includes an investigation conducted in October 1996 by Cathleen Moynihan, then Regional Vice President, Human Resources.

Also enclosed is Edmund Freeman's personnel file. However, it does not contain any investigatory material.

We do not have a central repository for reporting employees' requests for accommodations. We will continue to investigate if any record of requests made by similarly situated employees may exist.

Please feel free to contact me with any further questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'Will Queenan'.

William Queenan
Director, Human Resources Programs

AUG-12-2004 THU 01:41 PM MORGAN BROWN

FAX NO. 16173679629

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LEAH M. MOORE

August 12, 2004

Via Facsimile

Kathleen J. Hill, Esq.
Law Office of Kathleen J. Hill
92 State Street, Suite 700
Boston, MA 02109
617-742-4508 (fax)

Re: Griffith v. OneBeacon Insurance Company, et. al.
U.S.D.C. Massachusetts, Docket No. 03-CV-12573-EFH

Dear Kathleen:

I write with regard to the subpoena *duces tecum* served upon William Queenan.

Despite several conversations with Mr. Queenan and his careful review of the Complaint in the above referenced matter, Mr. Queenan continues to state that he has no knowledge of matters relevant to this litigation. Moreover, Mr. Queenan has no memory of his participation in matters addressing Ms. Griffith or her tenure with CGU/OneBeacon Insurance. Accordingly, Mr. Queenan is not a qualified witness for defendant companies OneBeacon Insurance Company and OneBeacon America Insurance Company.

Should you believe that Mr. Queenan is an appropriate witness, please produce copies of the documents in your possession that evidence such, including the documents you referenced in past conversations which contain either Mr. Queenan's name or signature. Upon evidence that Mr. Queenan does have relevant knowledge, Defendants will reconsider their opposition to his deposition.

Were Defendants to agree to Mr. Queenan's deposition, the subpoena *duces tecum* served upon him is both grossly overbroad and wholly inappropriate. As such, Defendants object to it.

AUG-12-2004 THU 01:42 PM MORGAN BROWN

FAX NO. 16173678628

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and state that were Mr. Queenan's deposition to be taken, the eight categories of documents you subpoenaed would not be produced. Should you resubmit your request in the form of a request for production of documents, Defendants' would revisit the appropriateness of your requests at that time.

Should you have any questions or concerns, please do not hesitate to contact me.

Regards,



Leah M. Moore

cc: William Queenan
Joan K. Geddes, Esq.
Keith B. Muntyan, Esq.